

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Wireless E911 Location Accuracy Requirements)	PS Docket No. 07-114
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Association of Public-Safety Communications)	
Officials-International, Inc. Request for)	
Declaratory Ruling)	
)	
911 Requirements for IP-Enabled Service Providers)	WC Docket NO. 05-196

COMMENTS OF THE: Lufkin, Texas Police Department

I. INTRODUCTION

The Lufkin Police Department provide these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-108, adopted by the Commission on May 31, 2007.

II. SUMMARY OF COMMENTS

This comment concerns the size of test areas for assessing compliance with the FCC wireless accuracy parameters.

II. DISCUSSION

A. EXPERIENCING THE PROBLEM EVERY DAY--PSAP Managers across the country recite episode after episode of delayed emergency response due to the absence of accurate location data from wireless 9-1-1 callers. As our rural county begins the implementation of Wireless Phase II it is our desire for providers to make PSAP service areas as the appropriate test area for wireless accuracy.

B. PUBLIC SAFETY HAS A DUTY TO RESPOND--A PSAP cannot abandon the duty to respond or the duty to seek improvement in the manner with which emergency calls arrive. Whether the emergency call arrives at a metropolitan or rural PSAP, the response relies heavily on 9-1-1 ALI and ANI data. Thus, wireless testing at PSAP service area testing is something that must be done.

C. LOCATION IS MOST IMPORTANT ELEMENT IN CALL INFORMATION--Public safety has always understood that in the absence of other call detail, the location information for effective dispatch purposes is most critical. Allowing wireless providers

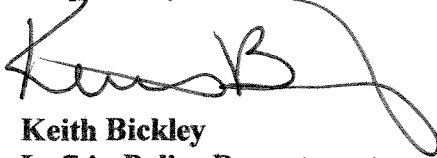
to specify wireless testing results by populous rather than geographically will hinder the accuracy of caller location.

"The Notice tentatively concludes"

IV. CONCLUSION

This agency asks that the Commission to approve the requirement for wireless providers to report testing at the PSAP service level. Therefore, we ask the Commission to rule in favor of this petition.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Keith Bickley', with a long horizontal flourish extending to the right.

**Keith Bickley
Lufkin Police Department
Communications Supervisor
300 E. Shepherd
Lufkin, TX 75901
(936) 633-0356**